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PACIFIC BELL TELEPHONE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE COMPANY,

Defendant.

CASE NO. 2:21-cv-00073-JDP

**DECLARATION OF NAVI SINGH
DHILLON IN SUPPORT OF MOTION TO
COMPEL COMPLIANCE WITH
SUBPOENA**

Judge: Hon. Jeremy D. Peterson

Complaint Filed: January 14, 2021

Zoom Hearing Date: November 9, 2023

Time: 10:00 a.m.

Courtroom: 9

I, Navi Singh Dhillon, hereby declare as follows:

1. I am a partner at the law firm of Paul Hastings LLP and counsel for Defendant Pacific Bell Telephone Company (Pacific Bell) in the above-captioned litigation. I submit this declaration in support of Pacific Bell's Motion to Compel Compliance with Subpoena. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.

2. Attached as **Exhibit A** is a true copy of the transcript of relevant portions of the July 18, 2023, Lead Contamination Conference Call wherein Plaintiff's counsel, William Verick, spoke.

3. Attached as **Exhibit B** is a true copy of the subpoena issued on August 4, 2023, and served on Below the Blue on August 9, 2023.

4. Attached as **Exhibit C** is a true copy of the meet-and-confer letter counsel for Pacific Bell sent to the representative of Below the Blue, Seth Jones, on September 5, 2023.

5. Attached as **Exhibit D** is a true copy of emails between Pacific Bell's attorneys and representatives of Below the Blue, between September 5, 11, 14, and 18, 2023, concerning the subpoena at issue.

6. Attached as **Exhibit E** is a true copy of a Proof of Service provided by S.D. Keshishian, a process server hired by Pacific Bell to serve Below the Blue, dated August 10, 2023, and served August 9, 2023.

7. Attached as **Exhibit F** is a true copy of emails between Pacific Bell's attorneys and a representative of Below the Blue, Seth Jones, between August 15, 2023 and August 23, 2023 concerning the subpoena at issue.

8. As of this writing, Pacific Bell has not received a single document from BTB in response to the Subpoena. Nor has any legal counsel of BtB contacted Pacific Bell.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed September 26, 2023 in San Francisco, California.

By: /s/ Navi Singh Dhillon
NAVI SINGH DHILLON